

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VICTOR HASSINE, SAMUEL HASSINE,)	
)	
)	
)	
Plaintiffs,)	Civil Action No. 03-212E
)	
vs.)	
)	
LT. LARRY SHERMAN and SECRETARY JEFFREY BEARD, in their official capacities,)	Judge McLaughlin
)	Magistrate Judge Baxter
)	
Defendants.)	

MOTION FOR LEAVE TO TAKE DEPOSITION

AND NOW, come the defendants, Lt. Larry Sherman and Secretary Jeffrey Beard, by their attorneys, Thomas W. Corbett Jr., Attorney General, Craig E. Maravich, Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief, Litigation Section, respectfully submit the following:

1. Plaintiff is an inmate incarcerated by the Pennsylvania Department of Corrections.
2. Plaintiff is represented by counsel.
3. Pursuant to Fed.R.Civ.P.Rule 30, defendants request leave of court in order to take the deposition of plaintiff.

CONCLUSION

WHEREFORE, it is respectfully requested this motion be granted.

/s/ Craig E. Maravich

CRAIG E. MARAVICH
Deputy Attorney General
Pa. I.D. #86219

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

OFFICE OF ATTORNEY GENERAL
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219

Date: October 19, 2005

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2005, I electronically filed the foregoing *Motion for Leave to Take Deposition* with the Clerk of Court using the CM/ECF system.

By: /s/ Craig E. Maravich
CRAIG E. MARAVICH
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